

**U.S. District Court
District of Columbia (Washington, DC)
CIVIL DOCKET FOR CASE #: 1:18-cv-01187-TSC**

CAMPAIGN LEGAL CENTER v. UNITED STATES
DEPARTMENT OF JUSTICE
Assigned to: Judge Tanya S. Chutkan
Case: 1:18-cv-01771-TSC
Cause: 05:552 Freedom of Information Act

Date Filed: 05/21/2018
Jury Demand: None
Nature of Suit: 895 Freedom of
Information Act
Jurisdiction: U.S. Government Defendant

Plaintiff

CAMPAIGN LEGAL CENTER

represented by **Adam B. Miller**
BUCKLEY LLP
1250 24th Street, NW
Suite 700
Washington, DC 20037
(202) 349-7958
Fax: (202) 349-8080
Email: amiller@buckleyfirm.com
LEAD ATTORNEY
ATTORNEY TO BE NOTICED

Danielle M. Lang
CAMPAIGN LEGAL CENTER
1411 K Street NW
Suite 1400
Washington, DC 20005
(202) 736-2200
Fax: (202) 736-2222
Email: dlang@campaignlegalcenter.org
LEAD ATTORNEY
ATTORNEY TO BE NOTICED

Nadav Ariel
BUCKLEY LLP
1250 24th Street, NW
Suite 700
Washington, DC 20037
(202) 349-8012
Fax: (202) 349-8080
Email: nariel@buckleyfirm.com
LEAD ATTORNEY
ATTORNEY TO BE NOTICED

V.

Defendant

**UNITED STATES DEPARTMENT
OF JUSTICE**

represented by **Paul Cirino**
U.S. ATTORNEY'S OFFICE FOR THE
DISTRICT OF COLUMBIA
555 Fourth Street, NW
Washington, DC 20530
(202) 252-2529
Fax: (202) 252-2599
Email: paul.cirino@usdoj.gov
LEAD ATTORNEY
ATTORNEY TO BE NOTICED

Joshua M. Kolsky
U.S. ATTORNEY'S OFFICE FOR THE
DISTRICT OF COLUMBIA

555 Fourth Street, NW
 Washington, DC 20530
 (202) 252-2541
 Fax: (202) 252-2599
 Email: joshua.kolsky@usdoj.gov
 TERMINATED: 12/26/2018

Date Filed	#	Docket Text
05/21/2018	<u>1</u>	COMPLAINT against UNITED STATES DEPARTMENT OF JUSTICE (Filing fee \$ 400 receipt number 0090-5492490) filed by CAMPAIGN LEGAL CENTER. (Attachments: # <u>1</u> Exhibit 1 – Feb. 1, 2018 FOIA Letter, # <u>2</u> Exhibit 2 – Feb. 28, 2018 CRD Response, # <u>3</u> Exhibit 3 – March 27, 2018 CLC Appeal, # <u>4</u> Civil Cover Sheet, # <u>5</u> Summons)(Miller, Adam) (Attachment 4 replaced on 5/22/2018) (zmd). (Entered: 05/21/2018)
05/21/2018	<u>2</u>	Corporate Disclosure Statement by CAMPAIGN LEGAL CENTER. (Miller, Adam) (Main Document 2 replaced on 5/22/2018) (zmd). (Entered: 05/21/2018)
05/21/2018		Case Assigned to Judge Tanya S. Chutkan. (zmd) (Entered: 05/22/2018)
05/24/2018	<u>3</u>	SUMMONS (3) Issued Electronically as to UNITED STATES DEPARTMENT OF JUSTICE, U.S. Attorney and U.S. Attorney General (Attachments: # <u>1</u> Notice and Consent) (zmd) (Entered: 05/24/2018)
06/04/2018	<u>4</u>	RETURN OF SERVICE/AFFIDAVIT of Summons and Complaint Executed as to the United States Attorney. Date of Service Upon United States Attorney on 5/25/2018. Answer due for ALL FEDERAL DEFENDANTS by 6/24/2018. (Miller, Adam) (Entered: 06/04/2018)
06/04/2018	<u>5</u>	RETURN OF SERVICE/AFFIDAVIT of Summons and Complaint Executed on United States Attorney General. Date of Service Upon United States Attorney General 05/25/2018. (Miller, Adam) (Entered: 06/04/2018)
06/04/2018	<u>6</u>	RETURN OF SERVICE/AFFIDAVIT of Summons and Complaint Executed. UNITED STATES DEPARTMENT OF JUSTICE served on 5/25/2018 (Miller, Adam) (Entered: 06/04/2018)
06/25/2018	<u>7</u>	NOTICE of Appearance by Joshua M. Kolsky on behalf of UNITED STATES DEPARTMENT OF JUSTICE (Kolsky, Joshua) (Entered: 06/25/2018)
06/25/2018	<u>8</u>	ANSWER to Complaint by UNITED STATES DEPARTMENT OF JUSTICE.(Kolsky, Joshua) (Entered: 06/25/2018)
06/28/2018		MINUTE ORDER: Before the Court in this FOIA case are a complaint and an answer. The requirements of LCvR 16.3 and Rule 26(f) of the Federal Rules of Civil procedure appear to be inapplicable. IT IS HEREBY ORDERED that the parties shall meet and confer and propose a schedule for proceeding in this matter. The schedule shall address the status of Plaintiff's FOIA request, the anticipated number of documents responsive to Plaintiff's FOIA request, the anticipated date(s) for release of the documents requested by Plaintiff's, whether a motion for an Open America stay is likely in this case, whether a Vaughn index will be required in this case, whether and when either party anticipates filing a dispositive motion, and any other pertinent issues. The parties shall file a joint status report that addresses these issues and that contains a proposed schedule and proposed order no later than 7/25/18. Signed by Judge Tanya S. Chutkan on 6/28/18. (DJS) (Entered: 06/28/2018)
06/28/2018		Set/Reset Deadlines: Joint Status Report and Proposed Scheduling Order are due by 7/25/18. (jth) (Entered: 07/01/2018)
06/29/2018	<u>9</u>	NOTICE of Appearance by Danielle M Lang on behalf of CAMPAIGN LEGAL CENTER (Lang, Danielle) (Entered: 06/29/2018)
07/20/2018	<u>10</u>	Joint STATUS REPORT by UNITED STATES DEPARTMENT OF JUSTICE. (Attachments: # <u>1</u> Text of Proposed Order)(Kolsky, Joshua) (Entered: 07/20/2018)

07/25/2018		MINUTE ORDER: Having considered the parties' Joint Status Report <u>10</u> , it is hereby ordered that the parties shall adhere to the following briefing schedule: Defendant's motion for summary judgment due September 7, 2018. Plaintiff's combined opposition and cross-motion due October 5, 2018. Defendant's combined reply / opposition due October 26, 2018. Plaintiff's reply due November 16, 2018. Signed by Judge Tanya S. Chutkan on 7/25/18. (DJS) (Entered: 07/25/2018)
07/26/2018		Set/Reset Deadlines: Cross Motion due by 10/5/2018. Response to Cross Motion due by 10/26/2018. Reply to Cross Motion due by 11/16/2018. Summary Judgment motion due by 9/7/2018. Response to Motion for Summary Judgment due by 10/5/2018. Reply to Motion for Summary Judgment due by 10/26/2018. (tb) (Entered: 07/26/2018)
09/06/2018	<u>11</u>	Unopposed MOTION for Extension of Time to <i>File Summary Judgment Motion</i> by UNITED STATES DEPARTMENT OF JUSTICE (Attachments: # <u>1</u> Text of Proposed Order)(Kolsky, Joshua) . (Entered: 09/06/2018)
09/11/2018		MINUTE ORDER: Granting <u>11</u> Unopposed Motion for Extension of Deadlines. Defendant's Motion for Summary Judgment due September 26, 2018. Plaintiff's Opposition and any Combined Cross-Motion for Summary Judgment due October 24, 2018. Defendant's Reply and Combined Opposition to any Cross-Motion for Summary Judgment due November 14, 2018. Plaintiff's Reply due December 5, 2018. Signed by Judge Tanya S. Chutkan on 9/11/18. (DJS) (Entered: 09/11/2018)
09/12/2018		Set/Reset Deadlines: Summary Judgment motion due by 9/26/2018. Response/Cross Motion due by 10/24/2018. Reply/Response to Cross Motion due by 11/14/2018. Reply to Cross Motion due by 12/5/2018. (tb) (Entered: 09/12/2018)
09/26/2018	<u>12</u>	MOTION for Summary Judgment by UNITED STATES DEPARTMENT OF JUSTICE (Attachments: # <u>1</u> Text of Proposed Order, # <u>2</u> Declaration (Cooper), # <u>3</u> Exhibit (A-D), # <u>4</u> Exhibit E)(Kolsky, Joshua) (Entered: 09/26/2018)
10/22/2018	<u>13</u>	ERRATA by UNITED STATES DEPARTMENT OF JUSTICE <u>12</u> MOTION for Summary Judgment filed by UNITED STATES DEPARTMENT OF JUSTICE. (Kolsky, Joshua) (Entered: 10/22/2018)
10/24/2018	<u>14</u>	NOTICE of Appearance by Nadav Ariel on behalf of CAMPAIGN LEGAL CENTER (Ariel, Nadav) (Entered: 10/24/2018)
10/24/2018	<u>15</u>	Cross MOTION for Summary Judgment by CAMPAIGN LEGAL CENTER (Attachments: # <u>1</u> Declaration of Nadav Ariel, # <u>2</u> Exhibit 1, # <u>3</u> Exhibit 2, # <u>4</u> Exhibit 3, # <u>5</u> Exhibit 4, # <u>6</u> Exhibit 5, # <u>7</u> Exhibit 6, # <u>8</u> Exhibit 7, # <u>9</u> Exhibit 8, # <u>10</u> Text of Proposed Order)(Ariel, Nadav) (Entered: 10/24/2018)
10/24/2018	<u>16</u>	RESPONSE re <u>12</u> MOTION for Summary Judgment filed by CAMPAIGN LEGAL CENTER. (Attachments: # <u>1</u> Declaration of Nadav Ariel, # <u>2</u> Exhibit 1, # <u>3</u> Exhibit 2, # <u>4</u> Exhibit 3, # <u>5</u> Exhibit 4, # <u>6</u> Exhibit 5, # <u>7</u> Exhibit 6, # <u>8</u> Exhibit 7, # <u>9</u> Exhibit 8, # <u>10</u> Text of Proposed Order)(Ariel, Nadav) (Entered: 10/24/2018)
11/13/2018	<u>17</u>	Unopposed MOTION for Extension of Time to File <i>Summary Judgment Brief</i> by UNITED STATES DEPARTMENT OF JUSTICE (Attachments: # <u>1</u> Text of Proposed Order)(Kolsky, Joshua). Modified on 11/16/2018 (znmw). (Entered: 11/13/2018)
11/15/2018		MINUTE ORDER: GRANTING Defendant's Unopposed Motion for Extension of Deadlines <u>17</u> . Defendant's Reply/Opposition due 11/19/18. Plaintiff's Reply due 12/10/18. Signed by Judge Tanya S. Chutkan on 11/15/18. (DJS) (Entered: 11/15/2018)
11/19/2018	<u>18</u>	Memorandum in opposition to re <u>15</u> Cross MOTION for Summary Judgment <i>and Reply in Support of Defendant's Motion for Summary Judgment</i> filed by UNITED STATES DEPARTMENT OF JUSTICE. (Attachments: # <u>1</u> Declaration, # <u>2</u> Exhibit A)(Kolsky, Joshua) (Entered: 11/19/2018)
11/19/2018	<u>19</u>	REPLY to opposition to motion re <u>12</u> MOTION for Summary Judgment <i>and Opposition to Cross-Motion for Summary Judgment</i> filed by UNITED STATES DEPARTMENT OF JUSTICE. (Attachments: # <u>1</u> Declaration, # <u>2</u> Exhibit A, # <u>3</u> Statement of Facts (Response))(Kolsky, Joshua) (Entered: 11/19/2018)

11/20/2018		Set/Reset Deadlines: Reply due by 12/10/2018. (tb) (Entered: 11/20/2018)
12/10/2018	<u>20</u>	REPLY to opposition to motion re <u>15</u> Cross MOTION for Summary Judgment filed by CAMPAIGN LEGAL CENTER. (Attachments: # <u>1</u> Declaration of Nadav Ariel, # <u>2</u> Exhibit 9 (June 12, 2018 email from B. Aguinaga to J. Gore))(Ariel, Nadav) (Entered: 12/10/2018)
12/10/2018	<u>21</u>	Memorandum in opposition to re <u>12</u> MOTION for Summary Judgment filed by CAMPAIGN LEGAL CENTER. (See docket entry no. <u>20</u> to view.) (ztd) (Entered: 12/12/2018)
12/26/2018	<u>22</u>	NOTICE OF SUBSTITUTION OF COUNSEL by Paul Cirino on behalf of UNITED STATES DEPARTMENT OF JUSTICE Substituting for attorney Joshua M. Kolsky (Cirino, Paul) (Entered: 12/26/2018)
01/04/2019	<u>23</u>	ENTERED IN ERROR.... MOTION to Stay <i>in Light of Lapse in Appropriations</i> by UNITED STATES DEPARTMENT OF JUSTICE (Cirino, Paul); Modified on 1/7/2019 (ztth). (Entered: 01/04/2019)
01/07/2019		NOTICE OF CORRECTED DOCKET ENTRY: re <u>23</u> MOTION to Stay <i>in Light of Lapse in Appropriations</i> was entered in error at the request of counsel. Document was filed in the wrong case. (tth) (Entered: 01/07/2019)
01/24/2019	<u>24</u>	NOTICE of Change of Law Firm Name by CAMPAIGN LEGAL CENTER (Ariel, Nadav) (Entered: 01/24/2019)
01/28/2019	<u>25</u>	NOTICE OF SUPPLEMENTAL AUTHORITY by CAMPAIGN LEGAL CENTER (Attachments: # <u>1</u> Exhibit A)(Ariel, Nadav) (Entered: 01/28/2019)
02/21/2019	<u>26</u>	RESPONSE re <u>25</u> NOTICE OF SUPPLEMENTAL AUTHORITY filed by UNITED STATES DEPARTMENT OF JUSTICE. (Cirino, Paul) (Entered: 02/21/2019)
03/28/2019	<u>27</u>	NOTICE OF SUPPLEMENTAL AUTHORITY by CAMPAIGN LEGAL CENTER (Attachments: # <u>1</u> Exhibit A, # <u>2</u> Exhibit B)(Ariel, Nadav) (Entered: 03/28/2019)
04/23/2019	<u>28</u>	RESPONSE re <u>27</u> NOTICE OF SUPPLEMENTAL AUTHORITY filed by UNITED STATES DEPARTMENT OF JUSTICE. (Attachments: # <u>1</u> Exhibit A)(Cirino, Paul) (Entered: 04/23/2019)